

[Submitting Counsel on Signature Page]

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

v.

Meta Platforms, Inc., Instagram, LLC, Meta
Payments, Inc., Meta Platforms Technologies,
LLC

Office of the Attorney General, State of Florida,
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta
Payments, Inc.

State of Montana, *ex rel.* Austin Knudsen,
Attorney General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook
Holdings, LLC, Facebook Operations, LLC, Meta
Payments, Inc., Meta Platforms Technologies,
LLC, Siculus, Inc.

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

4:23-cv-05448; 4:23-cv-05885; 4:24-cv-00805

MDL No. 3047

Case No. 4:22-md-03047-YGR
4:23-cv-05448-YGR
4:23-cv-05885-YGR
4:24-cv-00805-YGR

**DECLARATION OF BIANCA MIYATA
IN SUPPORT OF STATE ATTORNEYS
GENERAL'S OPPOSED
ADMINISTRATIVE MOTION TO SET
HEARING ON MOTION FOR RELIEF**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 I, BIANCA MIYATA, declare and state as follows:

2 1. I am a Senior Assistant Attorney General in the Consumer Protection Section of the
3 Colorado Department of Law. I am a member of good standing of the State Bar of Colorado. I make this
4 declaration based on my own personal knowledge. If called upon to testify, I could and would testify
5 completely to the truth of the matters stated herein.

6 2. I submit this declaration, as required by Civil Local Rule 7-11, in support of the State
7 Attorneys General's Opposed Administrative Motion to Set Hearing on Motion for Relief.

8 3. On September 6, 2024, this Court issued its Order Granting-in-Part and Denying-in-Part
9 Meta's Request for Party Discovery on Third-Party State Agencies Pursuant to Fed. R. Civ. P. 34 and
10 Granting Meta's [sic]¹ First, Second, and Third Administrative Motions for Leave to File Supplemental
11 Information. Doc. 1117.

12 4. The State AGs filed a Motion for Relief from the Order on September 20, 2024 (Doc.
13 1168); Meta filed its Response on September 27, 2024 (Doc. 1181); and the State AGs filed their Reply
14 on October 4, 2024 (Doc. 1194). The Motion for Relief is now fully briefed and ripe for resolution..

15 5. On October 13, 2024, counsel for Meta wrote that they do not consent to the State AGs'
16 request to set argument as they do not believe the issue merits argument. If the Court is inclined to hear
17 argument, Meta requests a date other than October 25, 2024, given a deposition in this matter is scheduled
18 on that date.

19 6. The State AGs submit this declaration in lieu of a stipulation because Meta has indicated
20 that it cannot consent to setting a hearing date.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed on October 15,
22 2024, in Denver, Colorado.

23
24 /s/ Bianca E. Miyata
BIANCA E. MIYATA

25
26 ¹ The caption of the Order refers to "Meta's" Administrative Motions. In the Order, the Court granted
27 the State AGs' three Administrative Motions for Leave to File Supplemental Information (Doc. 1031,
28 1074, and 1110). The reference to "Meta's" Motions appears to be a minor typographical error.

Senior Assistant Attorney General